

**IN THE CIRCUIT COURT FOR WILSON COUNTY, TENNESSEE
AT LEBANON**

<p>EARNESTINE MOSHIER,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>PROVIDENCE TRAIL APARTMENTS, BR PROVIDENCE NASHVILLE MANAGER, LLC, d/b/a BR PROVIDENCE NASHVILLE, LLC, BLUE ROCK REAL ESTATE, LLC, BELL PARTNERS INC., BELL PARTNERSHIP LLC, and 146 RYAN, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION FILE</p> <p>NO. 21-cv-608</p> <p>JURY TRIAL DEMANDED</p>
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NOTICE OF FILING NOTICE OF REMOVAL

COMES NOW Defendants Providence Trail Apartments, BR Providence Nashville Manager, LLC d/b/a BR Providence Nashville, LLC, Blue Rock Real Estate, LLC, and Bell Partners Inc. (collectively, “Defendants”), by and through the undersigned counsel, and hereby notify all parties and the Court pursuant to 28 U.S.C. § 1446(d) of the removal of this action to the United States District Court for the Middle District of Tennessee. A true and correct copy of Defendants’ Notice of Removal is attached hereto as **Exhibit A**. Pursuant to 28 U.S.C. § 1446, all further proceedings in this Court are hereby stayed.

Respectfully submitted, this 3rd day of May, 2022

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER, LLP**

/s/ James M. Burd
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Attorneys for Defendants

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **NOTICE OF FILING NOTICE OF REMOVAL** was electronically filed with the Court and served by way of United States Postal Service, return receipt requested, to the address of counsel of record below:

L. Mackenzie Cover
Michael D. Ponce & Associates
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Goodlettsville, TN 37072
Attorneys for Plaintiff

/s/ James M. Burd
James M. Burd, Esq.